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October 4, 2018

**VIA ECF**

Hon. Ronnie Abrams  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: Turner Network Sales, Inc. v. DISH Network, L.L.C., Civil Action No. 17-CV-7599**

Dear Judge Abrams:

During the post-discovery conference held on August 17, 2018, Plaintiff/Counter-Defendant Turner Network Sales, Inc. ("TNS, Inc.") informed the Court that it intended to file a motion for summary judgment prior to the close of expert discovery in this matter. At the request of the Court, TNS, Inc. and Defendant/Counter-Plaintiff DISH Network L.L.C. ("DISH") have reached agreement on a proposed briefing schedule and now jointly request that the Court approve the parties' agreed upon schedule, as follows:

- TNS, Inc. intends to file its motion and supporting papers on or before October 12, 2018;
- DISH shall file its opposition and supporting papers within forty-five (45) days after TNS, Inc. files its motion; provided, however, that DISH reserves the right to seek additional time to respond if DISH believes that additional expert discovery is necessary for its response;
- TNS, Inc. shall file its reply brief within 20 days after DISH files its opposition.

Additionally, because of the complexity of the issues and the number of claims and counterclaims at issue in this matter, the parties jointly request an extension of the page limits for their briefs, with 45 pages for the opening brief and opposition brief and 20 pages for the reply brief.

Because the parties' summary judgment papers will include documents and information that have been designated as either "CONFIDENTIAL" or "CONFIDENTIAL – OUTSIDE COUNSEL EYES ONLY" pursuant to the Stipulated Protective Order entered on April 6, 2018, the parties

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intend to file a separate letter motion requesting that they be permitted to file summary judgment papers that reference such materials under seal.

Respectfully submitted,

Troutman Sanders LLP

/s/ James A. Lamberth

Counsel for TNS, Inc.

Coblentz Patch Duffy & Bass LLP

/s/ Richard R. Patch

Counsel for DISH

cc: All Counsel (via ECF)